

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA]
v.] No. 20-CR-00006-PB
CHRISTOPHER CANTWELL]

ASSENTED TO MOTION TO CONTINUE TRIAL

Christopher Cantwell respectfully moves the Court to continue the jury trial in this case, currently scheduled for jury selection on March 3, 2020, for approximately 30 days.¹

As grounds for this motion, it is stated:

Mr. Cantwell made his initial appearance on January 23, 2020. The government provided Counsel with discovery on February 6, 2020. There is a high volume (multiple terabytes) of digital discovery in this case. Counsel requires additional time to address how this discovery will be obtained and processed and to review its contents. A thirty day continuance will allow time for counsel to review discovery in this case. Cantwell's case has not been continued previously.

In these circumstances, the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A) & (B)(iv). For these reasons, counsel respectfully requests a 30-day continuance of the trial date. A signed, written waiver of speedy trial rights will be submitted separately.

¹ No memorandum accompanies this motion because one is not necessary as the government has assented to the motion.

AUSA Anna Krasinski has been contacted and has no objection to this motion.

Respectfully submitted,

/s/ Eric Wolpin
Eric Wolpin
N.H. Bar #18372
Assistant Federal Public Defender
Eric_Wolpin @fd.org

/s/ Jeff Levin
Jeff Levin
N.H. Bar # 12901
Assistant Federal Public Defender
Jeff_Levin@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2020 the above document was served electronically upon all counsel of record through the CM/ECF filing system.

/s/ Eric Wolpin
Eric Wolpin